

A-302

**ATTACHMENT 5
TRAINING OUTLINE**

1.0 PERSONNEL TRAINING

This section provides information to familiarize site personnel with the post-closure operation of the remediation system at the former Safety-Kleen facility in Silver Springs, Maryland. The Site Health and Safety Plan was prepared to meet the applicable OSHA regulations, to prevent accidents, and to mitigate impacts should an accident occur. Improvements and amendments to this training program will be implemented when appropriate.

1.1 OVERVIEW AND OBJECTIVES

The three primary objectives of personnel training is as follows:

1. To train employees in the proper performance of their individual job duties.
2. To ensure employees are capable of effectively implementing the project emergency procedures, should the need arise.
3. To provide, where applicable, an overview of the site safety and other procedures to be followed in case of an accident or emergency by contractor, construction, drilling, survey and visitor personnel.

Each technician has undergone an internal hands-on training program for the task indicated. Technicians responsible for system monitoring and sampling have had extensive experience in conducting groundwater monitoring and supervising system decommissioning and well abandonment at other jobsites.

Personnel training consists of a combination of on-the-job training, formal classroom training, demonstrations and drills. The technical supervisor responsible for coordinating the technician training is Ms. Sara Brothers. Ms. Brothers is located at the Trihydro Corporation office at 6434 Rio Grande Blvd NW, Albuquerque, NM (505) 341-0476. The Health and Safety Manager responsible for training all Trihydro Corporation personnel on emergency procedures is Mr. Todd Forry. Mr. Forry is located at the Trihydro Corporation office at 1252 Commerce Dr., Laramie, WY (307) 745-7474.

The personnel training is designed to give basic training to individual who perform routine tasks associated with environmental monitoring and assessment. Increasingly specialized training is provided to those individuals performing more complex and /or potentially hazardous tasks on an as-needed basis. Additional training is administered based upon job duties and familiarity of equipment. On-the-job training is administered most often



by an individual's supervisor, but always by an individual with prior experience in a particular area and with the specific equipment.

On-the-job training can be divided into two major areas: Job specific training and equipment specific training. Jobs specific training is a mixture of classroom and on-the-job training is solely dependent upon the job function and relates directly to the job responsibilities specified on each job description. Equipment specific training is also a mixture of formal instructional (classroom) and on-the-job training, which included explanation of the specific use and purpose of the equipment; potential hazards, safety features and proper operating procedures. The amount of introductory and continuing on-the-job training depends on the complexity of the equipment and service to be provided, employee experience, and familiarity with the specific equipment.

1.1.1 FORMAL INSTRUCTIONAL TRAINING

Certain subject matter is not suitably addressed on-the-job and must be administered in a presentation or classroom format. Classroom training, which may include seminars given off-site industry professionals, is supplemented by audio visual/lecture presentations. In this manner, management can be assured that required subject matter has been addressed, site specific requirements can be emphasized and experts in a particular care can be available for feedback and questioning.

Self instruction/assigned readings is another method of training staff. This method is very effective, provided the subject matter is not complex.

1.1.2 ASSURANCE OF QUALITY TRAINING

Assuring the quality of training administered at the former Safety-Kleen, Silver Spring facility is accomplished through a number of means. First, Trihydro Corporation technical and professional staff are able to upon personnel and resources from the Trihydro Corporation corporate offices for implementation of their programs. Industry specialist can be brought in to address specific subjects. The training program is directed by a person who is trained in hazardous waste management procedures.



1.1.3 RECORD KEEPING

Each formal classroom training session is identified in the employees Health and Safety file in the Trihydro Corporation office. The personnel files identifies specific information presented and the date attended.

Following each classroom-style training session, attendees may sign an acknowledgment of training record form. Space is provided on the worksheets for detailed descriptions on the training and for the signature of their trainer or supervisor and the individual who received the training/supervision. Individuals training documents are kept in the Trihydro Corporation records until departure from the company, and in some cases beyond.

1.2 CORE TRAINING SUBJECTS

1.2.1 JOB SPECIFIC DUTY ORIENTATION

This orientation is intended to present in detail the duties which an individual is expected to perform. For new employees, supervisors will review the job description with the individual so that they understand what is expected of them. For new or unusual tasks, supervisors may review prepared plans (e.g., Calibration, Use and Maintenance of a field instrument). A mixture of classroom on-the-job training and self instruction will be utilized.

1.2.2 OVERVIEW OF SITE SPECIFIC SAFETY PROCEDURES

For Trihydro Corporation employees who work at the former Safety-Kleen, Silver Spring facility, the site-specific safety procedures established the following:

- Every individual is expected to conduct themselves in a safe manner;
- Minimum required safety gear for their job assignment;
- Areas or tasks that are restricted may only be entered or conducted when wearing prescribed levels of personal protective equipment;
- Locations of lists showing names and phone numbers of Emergency Coordinator and response agencies, and other emergency equipment (e.g., fire extinguisher);



- Requirements for the individual to report accidents, unusual events and unsafe conditions to their supervisor;
- That there are personnel responsible and procedures in place for inspection, maintenance and repair of safety equipment and emergency systems, and the individuals will receive additional training if they are expected to perform these tasks; and
- That there are various plans, procedures, and Job Safety Analysis (JSAs) intended to minimize the potential for adverse reactions or incidents involving materials handled at the facility. These plans include the site contingency plan and the personnel training plan. Individuals will receive additional training if they have additional responsibilities relative to these plans.

1.2.3 CONTINGENCY PLAN RESPONSIBILITIES

This discussion presents a brief overview of the facility Contingency Plan and assures that employees understand their particular responsibilities under the plan. In particular, individuals are instructed how to respond to various emergency or test conditions. These emergencies and test conditions include:

- Fire
- Explosion
- Spill of Hazardous Waste
- Surface Water Contamination
- Severe Weather Conditions, and
- Shutdown of Operations

Evacuation procedures and pre-determined meeting areas are discussed, including equipment shutdown procedures. In addition, procedures for returning to their work areas are discussed.

1.3 CONTRACTOR HEALTH AND SAFETY PLAN AND TRAINING

Prior to commencing the post-closure activities, each approved subcontractor will develop and implement a detailed Contractor's Health and Safety Plan (CHASP) in accordance and compliance with 29 CFR 1910.120 and all other applicable regulations of all workers engaged in site work. The CHASP will address emergency



response and contingency measures for the potential release of hazardous materials to the environment or site emergencies. Notification procedures are described in the CHASP and include, but are not limited to, audio sounds (horn). Should access to the gathering point be obstructed, personnel will proceed to the nearest “EXIT” location.

Contractor personnel who will be engaged in work at the site will be trained as specified in 29 CFR 1910.120. Subsequent “Tailgate Safety” meetings will occur immediately prior to each site visit, and on a daily basis to discuss site and activity hazards.

